NOTIFICATION of an IOWA TRAINING FIRE-DEMOLITION or a CONTROLLED BURN OF A DEMOLISHED BUILDING

Please review the attached Instructions before completing this notification. Fill out <u>completely</u>. Fire departments and/or cities may be cited for violations for incomplete notifications

1a.	Type of Notification: Training	g Fire	l Building Burn		
	1b. Original Revised use review the attached Instructions to determ olished building or a training fire. Controlled	mine whether the proposed burn would be c			
Que	estions #2-10 and #19 (Signature Certi	ification)must be completed for both t	types of burns		
2.	Fire Department or City official resp Address	ponsible for the burn (Name)			
	City	St	ateZip		
	Contact (Name) Telephone Number (Documentation of City Council approval is required for all demolished building burns.)				
3.	Building Owner Name				
	Address				
	City	State	Zip		
	Contact				
4.	Building Name				
	Address				
	City		nty		
5.	Building Size (Square Feet)	# of Floors			
		Prior Use			
6.	Person conducting thorough inspection	on for asbestos-containing materials [AC	CM1 (see Instructions):		
·.		_	ovij (see instructions).		
	AddressCity	State	Zip		
7.	Laboratory analysis method used to clear (Attach a copy of the laboratory report. S				
8.	Is/Was asbestos containing material Yes No	[ACM] present in the building?			
	was previously submitted for the re-	the material was/will be removed. If an moval, please attach a copy of the previous terial (ACM) must be removed before	ous notification.		

9a.	Will a ∐Yes			lemolition and burning? <i>See Instructions for de</i> 'complete 9b and 9c.	tails.		
	9b.	Have all asphalt roof	ing layers been ana	lyzed and found to not contain asbestos?			
		If "No," the asphalt roofing must be removed prior to the demolition and burn. Results of all asphalt roofing analyses must be attached to this notification.					
	9c.	for the $\Box 1^{st}$ or	$\square 2^{nd}$ burn for this lar year with aspha	tain on the structure during the burn, this notific calendar year (NOTE: The limit on burning two let roofing applies to both training fires and con	0		
10.	Burn da	ates Sta	art	Complete			
	NOTE: least thi demoliti	rty (30) days before the	ng burns, notification of proposed burn stan notification must be	Complete	e start of		
the b		Training Fire, skip to		ilding, cities must also complete questions gnature Certification). See instructions for d			
11.		Provide an explanation of why alternative methods of debris management are not being used to dispose of the building.					
12.	Descri	Describe what methods will be used to notify nearby residents of the proposed burn.					
13a.	Is the building being, or has it been, mechanically demolished before the controlled burn will occur? Yes No. If "Yes," complete 13b & c. If "No," complete 13d. NOTE: The NESHAP notification for demolition must be submitted at least 10 working days prior to the start of demolition. If an asbestos NESHAP notification for the demolition was previously submitted, please attack a copy with this notification.						
	13b.	Demolition dates	Start	Complete			
	13c.	Street Address		State Zip			
		Contact		Telephone	_		
	13d. If building has not been, or will not be, demolished prior to burning, please indicate why the proposed burn will not qualify as a training fire (check all that apply). Building not safe to enter (dilapidated and/or no longer standing); Building is too close to neighboring buildings; Fire fighter training exercise not being conducted; Other (please briefly summarize)						

14a.	☐Ye:		emolished building will be moved (if applicable).				
	14b. Exact burn site location (give site address, coordinates and/or attach a map). NOTE: A city may establish a burn site outside the city limits provided they meet the establish requirements. The burn site must be at least 0.6 miles from the nearest building inhabited person (including both residences and businesses).						
	14c.	Will additional buildings be included in the proposed burn? Yes No. If "Yes," complete 14d.					
	14d.	Indicate the original addre	esses for all other buildings to be in	ncluded in this proposed burn:			
			cation is required for each building or all buildings to be burned at this				
15.	Total square feet of demolished building material to be burned at the site						
16.	Approximate time that burn will occur. Start time End time NOTE: A demolished building burn may be conducted only between the hours of 6 AM and 6 PM.						
17.	If the burn is located outside the city limits please provide the exact distance, in miles, from the burn site to the nearest building inhabited by a person (including both residences and businesses). (Please, attach a map).						
18.	Including this proposed burn, how many demolished building burns will your city have conducted within the city limits in this calendar year?						
19.	I certify that the above information is correct, complete, and that the above referenced training fire or demolished building burn will be conducted in accordance with paragraphs 567 Iowa Administrative Code (IAC) 23.2(3)"g" and "j" [Published 3/16/05 and effective 4/20/05].						
	I certify that if unexpected asbestos-containing materials are found during the training fire or demolished building burn, the burning will cease immediately, and will not resume until all asbestos-containing materials are properly removed. I certify none of the material prohibited as specified in 567 IAC 23.2(3) "g" and "j" will be burned.						
_		(Signature)	(Date)	(Title)			

NOTIFICATION of an IOWA TRAINING FIRE–DEMOLITION or a CONTROLLED BURN OF A DEMOLISHED BUILDING

(Revised March 2005)

INSTRUCTIONS

These instructions describe how to complete the required Department of Natural Resources (DNR) notification form for training fires or demolished building burns (DNR Form 542-8010). Rules for these burns were amended March 16, 2005 and became effective April 20, 2005. As such, the DNR highly recommends that fire departments and cities carefully review these instructions, the applicable rules, and the DNR Fact Sheet before proceeding with building preparation or notification. All of these documents are available on our website at www.iowacleanair.com (click on links for Asbestos or Open Burning under the topics on the left side of the page).

Other considerations for demolished building burns

Note that all non-structural materials must be removed prior to demolition and burning, including rubber tires, chemicals, furniture, carpeting, household appliances, vinyl products (such as flooring or siding), trade waste, garbage, rubbish, landscape waste, and residential waste.

1a. **Type of Notification**: Check the box indicating either **Training Fire** or **Demolished Building Burn**. It is very important that cities and fire departments determine whether the proposed burn is a training fire or a demolished building burn. Both burns require prior notification and proper removal of all asbestos containing materials. Controlled burns of demolished buildings are subject to additional conditions, including the requirement to attach documentation of city council approval.

<u>Training Fires</u> – To be considered a training fire under DNR air quality rules, the proposed burn must be for the purposes of bona fide training of public or industrial employees in fire fighting methods. The fire must be conducted with the building structurally intact. It must also be conducted according to the <u>National Fire Protection Association (NFPA) 1403 Standard on Live Training Fire Evolutions (2002 Edition)</u> or a comparable standard.

<u>Controlled Burn of a Demolished Building</u> – If the proposed burn does not meet the definition of a training fire, a city may be able to conduct a controlled burn of a demolished building burn. A city is the only party that may conduct a controlled burn of a demolished building. However, demolished building burns are currently **not** allowed within the city limits of Cedar Rapids, Marion, Hiawatha, Council Bluffs, Carter Lake, Des Moines, West Des Moines, Clive, Windsor Heights, Urbandale, Pleasant Hill, Buffalo, Davenport, Mason City, or any other area where state implementation plans require the control of particulate matter. In other cities, there are limits on the number of demolished building burns that may be conducted within a given area, and additional criteria for building and burn specifications.

1b. **Type of Notification (continued)**: Check the box indicating **Original**, **Revised** or **Canceled**.

The initial notification submitted to the DNR will always be an "Original" notification. If any of the information on the burn has changed, the city or fire department must send a Revised notification. Additionally, if the city or fire department decides **not** to conduct the burn, they should submit a copy of the notification with the "Cancelled" box checked. **The city clerk must keep a copy of all notifications, for your records, for at least three years.**

Questions 2-5 (Building information)

It is very important the DNR has the correct building address, as well as current contact names and phone numbers for the City and the building owner. Note that the city, fire department (if applicable), **and** the building owner are responsible for ensuring that the proposed burn complies with all applicable air quality rules.

DNR Form 542-8010 Iowa Administrative Code (IAC) 23.2(3)"g" and "j" Revised: March 2005

Questions 6-8 (Questions regarding asbestos materials inspection and removal)

Prior to a structural training fire or a demolished building burn, the State Rules and Federal regulations require the following:

1. Thoroughly inspect the facility to determine the presence of any asbestos-containing materials (ACM). To meet the "thorough inspection" requirement, all suspected asbestos-containing materials must be sampled and laboratories analyzed, or are assumed to contain asbestos. Suspect asbestos-containing materials include, but are **not** limited to: floor tile, linoleum, pipe and boiler insulation, heat duct wrap and joint tape, cementitious siding and roofing, asphalt-based roofing, ceiling tiles, joint compound, and sprayed-on-texturing.

Please refer to the <u>Thorough Asbestos Inspection Guidance</u>, attached, for more information about conducting a thorough inspection for asbestos containing materials. **Additionally, you must attach a copy of the ACM laboratory analysis to your notification form.**

2. All asbestos-containing materials (friable and nonfriable) must be removed prior to building demolition. Asbestos removal is to be performed in accordance with the requirements contained in 40 CFR, Part 61, Subpart M (Sections 61.145 and 61.150). Please refer to the guidance, Applicable Portions of the Asbestos NESHAP, attached, for the training required to abate regulated asbestos containing material. Additionally, you must attach a copy of any previous notifications of ACM abatement or removal and/or provide a summary of how the ACM was, or will be, removed prior to demolition and burning.

Question #9 (Asphalt Roofing Material)

Limits exist on burning asphalt roofing materials in training fires or demolished building burns. **Each** layer of roofing must be properly analyzed and found to contain no asbestos. If any roofing material is found to contain asbestos, it must be **removed** prior to building demolition. If the asphalt roofing is found to contain no asbestos and will remain with the building materials during burning, copies of the laboratory reports verifying this must be submitted to the DNR along with the notification form.

During each calendar year, each city is limited to no more than **two** building fires per calendar year in which **asbestos-free**, asphalt roofing remains during the burn. The two-burn limit on asbestos-free, asphalt roofing includes **both** training fires and demolished building burns. If all asphalt roofing is removed, there is no limit on the number of **training fires** that a city and/or fire department may conduct. However, limits do exist on the number of demolished building burns that a city may conduct in a given area. This limit is explained later in these instructions.

Question #10 – Proposed burn dates

It is extremely important that cities and fire departments indicate the proposed burn dates on the notification. The city or fire department may choose alternate dates for burning. A revised notification must be submitted if the burn will no longer be conducted on the proposed dates.

For a controlled burn of a demolished building, the city fire department or city official must submit the completed notification at least **thirty** (30) **days** before the proposed burn date **and** at least **10 working days** prior to demolition. Notification of a training fire must be postmarked or delivered to the DNR at least **10 working days** before the proposed burn date. Working days are Monday through Friday. Saturday and Sunday do not count as working days. If a notification is Faxed, it must be followed by a hard copy, postmarked or hand delivered accordingly.

If you are conducting a **training fire**, proceed to the Signature Certification at the end of the notification form. If you are conducting a **controlled burn of a demolished building**, you must also complete questions **11-18**.

Question #11 (Alternative methods of building debris management)

The DNR encourages cities to explore and utilize, to the extent possible, alternative methods of building disposal. Please briefly describe what, if any, alternative disposal methods were explored and used. This may include salvaging, recycling, re-using rubble for fill, and landfilling. Please also briefly explain why burning was chosen to dispose of some or all of the building.

Question #12

The DNR strongly encourages cities to notify area residents of the proposed burn. Please briefly describe what method(s) the city will use to notify nearby residents.

Questions #13a-d

13a. Please check whether or not the building will be mechanically demolished prior to burning. Note that **all** asbestos containing materials must be properly removed **prior** to building demolition. If the building is not safe to enter for a thorough inspection and/or asbestos removal, the building may **not** be burned.

If you answered "yes" to 13a, please also complete questions 13b & c for the demolition contractor information and demolition start dates. If you previously submitted an asbestos NESHAP notification for the demolition, please attach a copy. Notification must be submitted at least 10 working days prior to the start of demolition.

If you will **not** be mechanically demolishing the building prior to burning, please complete 13d. Please check the box best describing the reason why the city has elected to conduct a demolished building burn rather than a training fire. This information allows the DNR to track information about the reasons for conducting demolished building burns.

Questions 14a-d

14a. Please check whether the demolished building will occur at the building's original address indicated in question #4. If "yes," proceed to question 15. If "no," complete questions 14b, c and d, as applicable. For question 14b, indicate the exact location of the building burn site. It is extremely helpful if you attach a map. A city may establish a burn site outside the city limits, provided they meet the established requirements. The city must also notify the chair of the county board of supervisors if a burn site is established outside the city limits. This notification must be submitted to the chair of the county board of supervisors at least **30 days** prior to the date of the burn.

For question 14c, indicate whether materials from **additional** buildings will be included in this burn. If "no," proceed to question #15. If "yes," complete question 14d, indicating the original address for all buildings to be included in this burn. Note that a complete Notification of Controlled Burn of a Demolished Building must be submitted for each building to be burned. It is helpful if all notifications are submitted together.

Question #15

Indicate the total square feet of all demolished building materials to be burned at this site on the proposed dates. Note that the sum total square feet for each burn may **not** exceed **1700 square feet**. For purposes of this rule, building square feet includes both finished and unfinished basements, but does not include unfinished attics, carports, attached garages and porches unprotected from the weather. If a burn site is established outside the city limits, note that the sum total square feet of material to be burned each day may **not** exceed **1700 square feet**.

Ouestion #16

Indicate the approximate time the burn will occur. Note that a demolished building burn may only be conducted between **6 AM** and **6 PM**. The city must adequately schedule and control the burn to ensure the burning is completed by 6 PM.

Questions #17

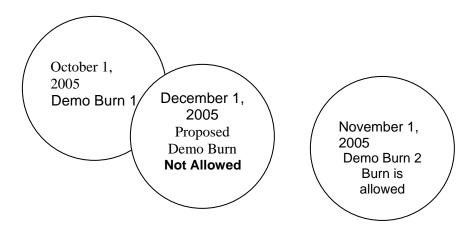
Indicate the approximate distance, in miles, from the burn site to the nearest building inhabited by a person. This includes both residences and businesses. Please attach a map. The city clerk must keep all required records on burn site locations for at least three years.

Question #18

For burn sites established outside the city limits, indicate how many demolished building burns, including the proposed burn, the city has conducted within the calendar year.

For burns conducted within city limits, each city may conduct no more than one (1) demolished building burn in every 0.6 miles radius circle in any one (1) calendar year period. It is the city's responsibility to keep sufficient maps, burn information, and a copy of this notification to ensure compliance with these requirements. The city clerk must keep all required records for at least three years.

The diagram below illustrates how to draw the circles on a map. The center of each circle is the site of demolished building burn. The radius of each circle represents 0.6 mile. If one circle will overlap another in any calendar year, the burn is not allowed.



If an additional burn is proposed within the calendar year, its 0.6 mile radius circle may **not** overlap the circle of the first burn. If the proposed burn would impact this area, the demolished building burn is **not** allowed under state air quality rules. Burns meeting the definition of training fires do **not** need to be included under these limits.

Question #19 (Signature Certification)

A city official must agree to the certification statement by signing and dating the notification.

Questions concerning training fires or demolished building burns

If you have questions about completing the notification or the requirements for training fires or demolished building burns, please contact the DNR Air Quality Bureau office at 515-242-5100.

Submit notifications to: Building Burn/Asbestos NESHAP Coordinator

Iowa DNR – Air Quality Bureau 7900 Hickman Road, Suite 1 Urbandale, Iowa 50322

Attachment A Thorough Asbestos Inspection Guidance

The Asbestos NESHAP (40 CFR 61.145) regulation stipulates that the owner operator of the demolition or renovation activity and prior to the commencement of the demolition or renovation, shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos-containing material (ACM) [40 CFR 61.145 (a)].

Asbestos is a known carcinogen. When a building with asbestos-containing materials is burned, everything burns except the asbestos. The asbestos fibers are then free to drift in the air, making it possible for humans to be exposed through normal breathing.

The thorough inspection portion of the asbestos NESHAP regulation is important, because it identifies asbestos-containing material prior to the burn. This allows asbestos-containing material to be removed properly, thus eliminating the hazard of airborne asbestos fibers.

If the building is to be mechanically demolished in preparation for a controlled burn of a demolished building, the thorough inspection must occur **before** the building is demolished. Similarly, if a building is unsafe to enter, and suspect material cannot be identified, the city may **not** conduct a controlled burn on that structure. Rather, the city or fire department must assume that asbestos containing material is present, and manage the building debris accordingly.

Manufacturers put asbestos in over **3000** different building products including floor coverings, plaster, and roofing materials. Old buildings are not the only structures that contain asbestos. In fact, asbestos is still being used in new building products today. Therefore, a trained inspector is needed to identify and properly sample **all** suspect materials in order to fulfill the thorough inspection portion of the asbestos NESHAP.

The Environmental Protection Agency recommends that the person who conducts the thorough inspection of the facility attend and pass the 3-day Building Inspectors Course developed under the Asbestos Hazard Emergency Response Act (AHERA) program.

Attachment B Applicable Portions of the Asbestos NESHAP (40 CFR 61.145)

Notifications

- (a) Applicability. To determine which requirements of paragraphs (a), (b), and (c) of this section apply to the owner or operator of a demolition or renovation activity and prior to the commencement of the demolition or renovation, thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable ACM.
- (b) Notification requirements. Each owner or operator of a demolition or renovation activity to which this section applies shall:
- (b)(1) Provide the Administrator with written notice of intention to demolish or renovate. Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable.
- (b)(3)(i) At least 10 working days before asbestos stripping or removal work or any other activity begins (such as site preparation that would break up, dislodge or similarly disturb asbestos material), if the operation is described in paragraphs (a) (1) and (4) (except (a)(4)(iii) and (a)(4)(iv)) of this section. If the operation is as described in paragraph (a)(2) of this section, notification is required 10 working days before demolition begins.
- (b)(4) Include the following in the notice:
- (b)(4)(i) An indication of whether the notice is the original or a revised notification.
- (b)(4)(ii) Name, address, and telephone number of both the facility owner and operator and the asbestos removal contractor owner or operator.
- (b)(4)(iv) Description of the facility or affected part of the facility including the size (square meters [square feet] and number of floors), age, and present and prior use of the facility.
- (b)(4)(v) Procedure, including analytical methods, employed to detect the presence of RACM and Category I and Category II nonfriable ACM.
- (b)(4)(vii) Location and street address (including building number or name and floor or room number, if appropriate), city, county, and state, of the facility being demolished or renovated.
- (b)(4)(ix) Scheduled starting and completion dates of demolition or renovation.
- (b)(4)(xvi) Description of procedures to be followed in the event that unexpected RACM is found or Category II nonfriable ACM becomes crumbled, pulverized, or reduced to powder.

Training for asbestos abatement

40 CFR 61.145(c)(8) Effective 1 year after promulgation of this regulation, no RACM shall be stripped, removed, or otherwise handled or disturbed at a facility regulated by this section unless at least one on-site representative, such as a foreman or management-level person or other authorized representative, trained in the provisions of this regulation and the means of complying with them, is present. Every 2 years, the trained on-site individual shall receive refresher training in the provisions of this regulation. The required training shall include as a minimum: applicability; notifications; material identification; control procedures for removals including, at least, wetting, local exhaust waste disposal work practices; re-porting and recordkeeping; and asbestos hazards and worker protection. Evidence that the required training has been completed shall be posted and made available for inspection by the Administrator at the demolition or renovation site.